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May 14, 2020

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VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: Park v. FDM Group Holdings PLC, et al., No. 1:16-cv-01520

Dear Judge Netburn:

We write jointly to update the Court on the progress of discovery in this matter.

Despite scheduling challenges caused by the coronavirus pandemic, since the Court's May 1, 2020 order, the parties have made additional document productions, taken an additional plaintiff deposition remotely, scheduled one plaintiff deposition to occur next week, and are in the process of scheduling the final plaintiff deposition.

When the parties filed their April 30 status update seeking an extension of fact discovery until May 15, the parties were attempting to resolve one open discovery issue concerning the production of documents related to one of the Rule 30(b)(6) topics. Since then, the parties have reached agreement on that issue, but the parties need additional time to produce the documents anticipated by that agreement and then conduct the Rule 30(b)(6) deposition on June 10, 2020. Taking the two remaining plaintiff depositions and the Rule 30(b)(6) deposition after the deadline to complete fact discovery will not change the expert discovery deadline, which is currently August 14, 2020.

Letter to Hon. Sarah Netburn

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We hope this schedule is agreeable to the Court.

Respectfully Submitted,

JENNER & BLOCK LLP

s/ Emma J. Sullivan

Emma J. Sullivan

THE LAW OFFICE OF CHRISTOPHER Q. DAVIS

s/ Christopher Q. Davis

Christopher Q. Davis